

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

BARBARA BLAND,

Plaintiff,

v.

Case No. 2:22-cv-00102-LGW-
BWC

SUN MOON ENTERPRISES, INC.,
RAJESHREE PATEL, and PRANAB
CHAKRABORTY,

Defendants.

JOINT STATUS REPORT

Plaintiff, Barbara Bland, (“Plaintiff”), and Defendants, Sun Moon Enterprises, Inc., Rajeshree Patel, and Pranab Chakraborty (“Defendants”), (hereinafter collectively “the Parties”), by and through their respective undersigned counsel, hereby submit this Joint Status Report:

On March 16, 2023, the Parties mediated their claims and reached a full and final settlement of all existing and potential claims, including Plaintiff’s claims under the Fair Labor Standards Act of 1938. One term of the mediation was that the parties would work expeditiously to finalize this matter. Specifically, the parties agreed, on March 16, 2023, that Defendants would “provide counsel for Bland a draft Settlement Agreement and Motion to Approve within seven (7) days of the execution of this Settlement Memorandum.” Defendants also insisted that, in order

to settle Plaintiff's FLSA claims, Plaintiff would need to "execute a general release of all claims against [Defendants] to include, but be not limited to, her claims relating to her alleged eviction and a Final Settlement Agreement incorporating the terms set forth in this Settlement Memorandum, a mutual no future contact between the parties provision and a tax indemnity from Bland to SME with respect to any taxes due on the Settlement Amount. Should the Court not approve a general release, the parties agree to conform the Settlement Agreement to require a limited wage and hour claims only release." The Parties have not finalized the general release required by Defendants to settle Plaintiff's FLSA claims referenced in the March 16, 2023 Settlement Memorandum. Earlier today, a proposed final draft of the General Release was provided to Plaintiff for her consideration.

Respectfully submitted this 4th day of May, 2023.

<u>/s/ Tyler B. Kaspers</u> Tyler B. Kaspers, Ga. Bar No. 445708 THE KASPERS FIRM, LLC 152 New Street, Suite 109B Macon, GA 31201 404-944-3128 tyler@kaspersfirm.com <i>Counsel for Plaintiff</i>	<u>By:/s/ Ian E. Smith</u> Ian E. Smith, Esq. Georgia Bar No. 661492 Spire Law, LLC 2572 W. State Road 426 Suite 2088 Oviedo, FL 32765 E-mail: ian@spirelawfirm.com sarah@spirelawfirm.com filings@spirelawfirm.com <i>Attorneys for Defendants</i>
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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of May, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Ian E. Smith

Attorney